



The Truth About Texting on Toll Free

**THE INDUSTRY IS THRIVING
BECAUSE THE SUBSCRIBER HAS
CONTROL**

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The Industry is Thriving Because the Subscriber Has Control

About this Document

The young market for texting on toll free is thriving. As new services and business models emerge, giving toll free subscribers control over their own numbers is the best route to a healthy, competitive marketplace. This white paper presents facts that challenge common misconceptions about A2P business texting on toll free to show that:

- Major brands are adopting texting on toll free, and consumers love it
- Critical consumer protection processes are in place and working well
- Zipwhip has acted in good faith to extend the life and relevance of the entire toll free industry
- Texting on toll free is an emerging market that should be allowed to innovate and grow without unnecessary intervention

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Texting on Toll Free is Thriving

A Young and Growing Market

Major Brands are Texting on Toll Free

A Young and Growing Market

The market for business texting is thriving due to investment and innovations by Zipwhip. Zipwhip built the infrastructure that makes high-volume texting with existing business phone numbers possible.¹ If you've received a text message from your dentist, texted with a customer service agent, or opted to receive updates by text instead of email, you've probably used the infrastructure that Zipwhip built.

Business texting includes any form of consumer-to-business text messaging exchanged with a landline, VoIP, or toll free number. Considering that toll free numbers represent only 16 percent of all non-mobile phone numbers, texting on toll free represents a small but important subset of the business texting market.²

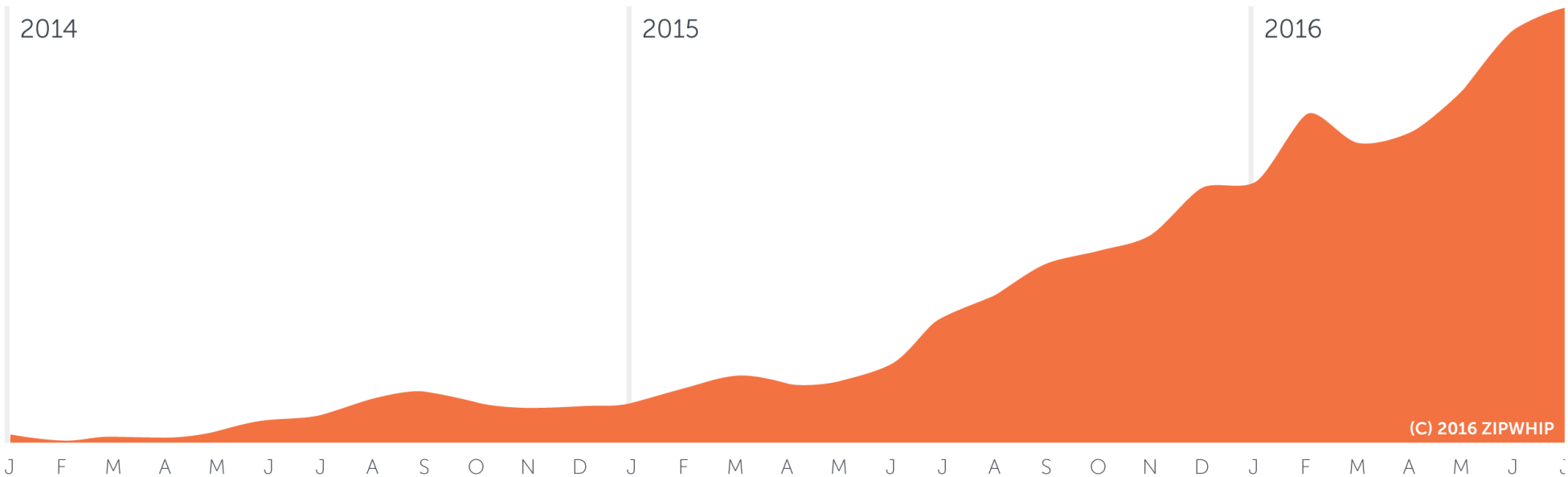
Texting on toll free is also one of the fastest-growing areas of business texting. It's growing at a healthy 300 percent year-on-year,³ well known brands like Google and Nestle are embracing it, and consumers love it. According to AT&T, 85 percent of consumers prefer receiving a text message over a voice call or email.⁴ This level of acceptance is truly amazing when you consider that commercial texting on toll free phone numbers is barely three years old, and major brands are generally slow to adopt new technologies.

1 See: Ben Munson. "Zipwhip Opens Up Landline and Toll-Free Numbers to SMS." Wireless Week. (Oct 16, 2013)
2 See: John Lauer, "Op-Ed: Setting the Record Straight on Toll-Free Texting." Wireless Week. (Sept 2, 2016) ("Lauer Op-Ed")
3 See: AT&T. "Connecting with Text: The Shift to Landline and Toll Free Business Texting." White Paper. (Jan 2016)
4 Ibid.

A quick, effective activation process has been key to the rapid rate of adoption of this new technology by major companies.⁵ This activation process has as its foundation the principle that *a toll free subscriber controls its own toll free numbers*.⁶ Therefore, after verifying that a business is, in fact, the toll free subscriber, a texting provider can follow the same secure process to activate all of that business' phone numbers for texting, including both landline and toll free numbers.⁷

Somos has petitioned for a different process to activate texting for toll free phone numbers specifically, which would require a third party RespOrg's approval.⁸ There is no technical reason to require RespOrg involvement,⁹ but it would complicate adoption and delay activations with little to no benefit to the toll free subscriber.¹⁰ Thus, changes to the activation process are unnecessary and would slow the growth of toll free and limit future adoption by major brands.

How fast is texting on toll free growing?



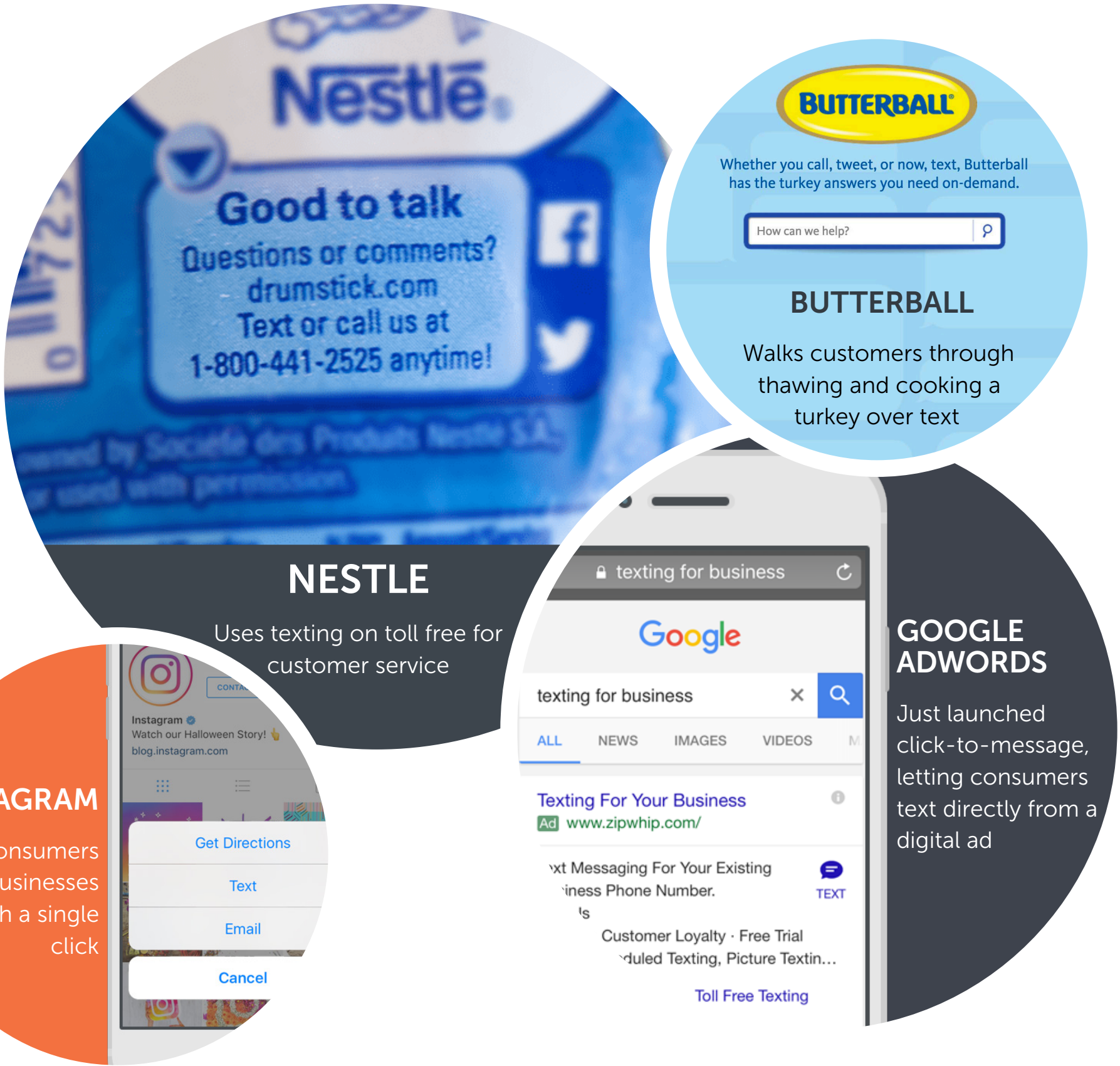
5 See: Lauer Op-Ed
6 See: CTIA. "SMS Interoperability Guidelines." Version 3.2.2. (Jan 2015)
7 In accordance with evolving NIST guidance on digital identity assurance, Zipwhip supports a combination of identity proofing techniques to increase user adoption, decrease false negatives, and detect to the best extent possible the presentation of fraudulent identities by a malicious applicant. See: Draft NIST Special Publication 800-63-3, Digital Authentication Guideline. (2016)

8 See: Petition of Somos, Inc. for a Declaratory Ruling Regarding Registration of Text-Enabled Toll-Free Numbers, CC Docket No. 95-155. (Oct 28, 2016) ("Somos Petition")
9 See: Ibid. at 5
10 See: Zipwhip, Inc. Ex Parte Letter, WT Docket No. 08-7. (Oct 20, 2016) ("Zipwhip Letter")

Major Brands are Texting on Toll Free

The process for activating texting on toll free phone numbers isn't an abstract policy question. It ties directly to business adoption. Nestle, Google, Instagram, and Butterball are a few well-known brands that have incorporated business texting into their core products and services. The key has been a single, simple process for all business numbers. As long as it remains easy to adopt, business texting will continue to grow.

Potential market growth is significant. Business messaging is expected to grow to a \$60 billion industry by 2018.¹¹ It is estimated that there could be up to 60 use cases for texting within a single organization.¹² But, it's still new. The market should be allowed to continue to develop and evolve without being hampered by the adoption of burdensome, unnecessary rules. In the next section, we explore how business texting works and clear up some common misconceptions about the differences between consumer texting and business texting.



¹¹ See: Steve French, "The Resurgence of E2P Messaging and What it Means for Your Business." OpenMarket Blog. (Sept 10, 2015)
¹² Ibid.



How Business Texting Works

Protecting Consumer Traffic
Common Misconceptions
Continuous Risk Management

Protecting Consumer Traffic

Somos has made a number of inaccurate claims and assertions about the texting on toll free industry that seem to be rooted in a misunderstanding of how business texting actually works. When a consumer texts with a business, the conversation appears in the default messaging app, just like texts with friends and family. However, behind the scenes, person-to-person (“P2P”) consumer texting and application-to-person (“A2P”) business texting are very different.

A2P and P2P texting traffic are handled differently at the network level for technical and commercial reasons, not least consumer protection.¹³ Consider how many consumers in the U.S. can receive texts (it’s over 92 percent of all adults)¹⁴ and the speed at which an automated script can send texts (up to 1,000 per second)¹⁵. A bad actor with 250 phone numbers and an A2P connection could spam the entire U.S. population in under 20 minutes. The vast majority of A2P texting is legitimate, wanted traffic, but the risk of abuse is real and its potential impact is tremendous.

This risk is specific to business texting. A typical consumer doesn’t control 250 phone lines, but a commercial provider can. That’s why a service provider must have a Service Level Agreement

(“SLA”) in place before a wireless operator will give it the capability to send high volumes of automated commercial texting traffic.

In addition to commercial terms, a contractual SLA establishes consumer protection requirements for A2P traffic. For example, the SLA might specify that A2P texting providers support fraud monitoring, CALEA compliance, and consumer opt-out controls like the “STOP” command.¹⁶ With consumer and network protections in place, A2P texting providers can send higher volumes of text message traffic than the average consumer. This benefits businesses and consumers by providing access while blocking abuse.

A2P and P2P channels are not interchangeable. Service providers that forgo the SLA to send A2P-caliber (i.e., high-volume, automated, or commercial) traffic over the P2P channel are almost always violating their terms of service by using the wrong pipe.¹⁷ Some messaging providers do this accidentally, while others willfully game the system.¹⁸ These providers may achieve lower prices or encounter complications with spam filters, but it’s because they’re likely in breach of contract, not because of abuse as Somos has alleged.

¹³ According to Twilio: “Carriers want to protect their subscribers from spam, and will only grant bulk messaging capabilities to applications that they’ve screened and approved.” See Laura Shaffer “Short Codes, Big Lessons.” Twilio Blog. (Dec 3, 2014)

¹⁴ See: Monica Anderson. “Technology Device Ownership: 2015.” Pew Research Center, (Oct, 2015)

¹⁵ See: Yahoo Finance. “Zipwhip Toll Free Texting Now Supports 1,000 SMS/Second.” Press Release. (September 24, 2015) (“Yahoo Press Release”)

¹⁶ See: Lauer Op-Ed.

¹⁷ A standard inter-carrier P2P texting contract reads: “A message may originate from a mobile phone, a computer or an internet-based service, but the message must have been initiated due to human interaction, versus an automated or timed message.” This precludes bulk automated or subscription-based messaging over P2P phone numbers.

¹⁸ For a discussion of snowshoe spam, see: Fact Atlas. “Choice and Innovation: Safeguarding the SMS Marketplace.” Exhibit to letter from Anna Henningsgaard, Fact Atlas, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 08-7 (Dec 21, 2015) (“Fact Atlas White Paper”) at 7

A Bus in the Bike Lane

Anyone with a mobile account can send P2P text messages, but driving high-volume A2P traffic is a privilege for licensed service providers.

- › Each wireless operator negotiates separate SLAs to establish safeguards before licensing texting providers to send high-volume A2P traffic.
- › For example, many wireless operators require A2P texting providers to support the “STOP” command so consumers can choose to opt out.
- › Sending unlicensed A2P traffic down the P2P channel is like driving a bus in the bike lane: unsafe, impractical, and bad for traffic flow.



Common Misconceptions

Before 2014, carriers did not support A2P texting on 10-digit phone numbers at all because it risked disrupting consumer traffic. Wireless operators cannot effectively protect consumers from spam and phishing when A2P-caliber traffic is sent in the P2P channel. To wireless operators, accounts with abnormally high message traffic and low voice and data usage would appear to be sending spam.¹⁹

Before 2014, short codes offered the only operator-supported channel for high-volume A2P business texting.²⁰ However, short codes are imperfect and businesses demanded a better texting product. Zipwhip spent two years building the infrastructure that make it possible for A2P text messaging to travel safely over 10-digit phone numbers, including toll free numbers.²¹ Without the systems and safeguards that Zipwhip put in place, a trusted texting to toll free ecosystem simply would not exist.

This technology is so new that CTIA is actively working with its Messaging Working Group (MWG) to develop new principles and best practices.²² Service providers are in the process of negotiating contracts with the wireless operators to introduce new services. In short, innovation is ongoing and the market is evolving appropriate safeguards on its own.

¹⁹ See: Fact Atlas White Paper at 5
²⁰ See: Yahoo Press Release
²¹ Ibid.
²² See: CTIA. Ex Parte Presentation, WT Docket No. 08-7 (Oct 31, 2016) ("CTIA Presentation")

Misconception

Before Zipwhip, toll free phone numbers were free to exchange text messages over the P2P channel, just like mobile-to-mobile consumer texting.

Status: **FALSE**

Inter-carrier compensation rates outside the toll free text message marketplace typically register between \$0.0015 and \$0.002 per text, or as low as \$0.0005 per text.

Status: **MISLEADING**

Prices increased between six- and fifteen-fold after A2P texting on toll free was introduced in 2014.

Status: **FALSE**

The price differences between exchange rates paid by texting on toll free service providers and the rates for mobile-to-mobile consumer texting is driven by an artificial market imbalance.

Status: **FALSE**

The Truth

Before 2014, there was no legitimate way to exchange commercial text messages with toll free numbers. This traffic likely violated the terms of service for the texting service provider, the inter-carrier vendor, or both.

Inter-carrier rates for P2P traffic can be as low as \$0.0005 per message, but rates for A2P traffic with features and throughput comparable to texting on toll free typically falls between \$0.0025 and \$0.005 per message sent and received, plus additional fees.

This comparison is invalid because A2P texting on toll free didn't exist before 2014. However, the cost of texting on toll free is lower than short codes, the only other A2P texting product in the market.ⁱ

This willfully ignores the value of premium A2P features and the cost of administering them:

- › High-volume throughput
- › Delivery receipts
- › MMS picture messaging
- › Commercial reporting
- › Spam and fraud mitigation
- › "STOP" command enforcement

None of this functionality is supported over P2P.

ⁱ Inter-carrier rates are not publicly available, but texting service providers' rate cards can reflect relative costs. For example, Twilio charges businesses a similar price (\$0.075 per message received and sent) for A2P toll free and P2P local phone numbers. The cost for a 5- or 6-digit A2P short code begins at \$3,000 per month plus \$0.05 to receive and \$0.01 to send messages. See: Twilio's website, <https://www.twilio.com/sms/pricing>

Continuous Risk Management

Zipwhip works with industry-leading vendors to ensure consumer protection,²³ and the current system is doing an excellent job of identifying real threats to consumers and stopping them proactively to minimize consumer harm.

10 million phishing texts were intercepted in just one month in 2016.

Between August and September 2016, service providers attempted to send over 10 million phishing texts over toll free numbers. Mobile subscribers would have been impacted if it were not for the safeguards that Zipwhip maintains at the network infrastructure level.²⁴

Zipwhip supports a continuous risk management process fashioned after industry standard best practices for cybersecurity.²⁵

- It begins by modeling known attack vectors.
- It performs an evaluation to identify gaps in capability and then makes, prioritizes, and implements a plan to address gaps.
- As business objectives change and the risk environment evolves, the process is repeated.

²³ See: Adaptive Mobile, "Zipwhip Chooses AdaptiveMobile to Keep Its Fast-Growing Enterprise-to-Person (E2P) Text Messaging Service Abuse-Free." (Feb 9, 2016)

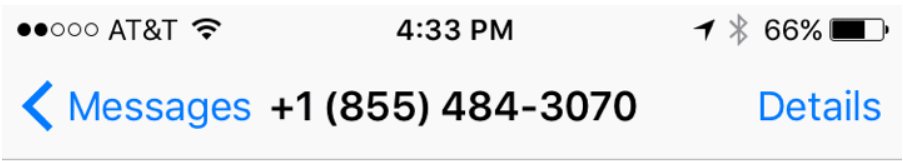
²⁴ See: Lauer Op-Ed

²⁵ See: Department of Energy, "Cybersecurity Capability Maturity Model." Version 1.1. (Feb 2014) at 15

It's easy to imagine ways in which bad actors could thwart various systems, but that's only the first step. It's essential to prioritize threats and address the most likely and prevalent attack vectors first. Phishing scams represent the greatest threat to consumers in texting on toll free, and thus combatting phishing has been the top priority.

When a new attack vector is identified, the right answer isn't to throw the whole system away. The mature response is to evaluate the risk and make, prioritize, and implement a plan to address it. The fact that scams are being intercepted shows that this system works well. The process is already underway to weigh the potential vulnerabilities to number hijacking and mitigate the risk before it impacts consumers.

A REAL PHISHING TEXT SCAM



Text Message
Today 8:58 AM

Bank of America: [526478](#) is your authorization code which expires in 10 minutes. If you didn't request the code, reinstate your account at [www.boa-security.com](#)

What About Hijacking?

A recent investigation raised concerns that toll free numbers can be hijacked for texting. Is this a real risk?

In August 2016, analysts working on Somos' behalf conducted a secret shopper investigation. Through social engineering, an employee at one company, a reseller, was led to activate three numbers with insufficient validation.ⁱⁱ

Here's the story that was buried in the fine print:

- All technical processes, including the TSS Registry, are vulnerable to social engineering.
- The existing validation process worked 100 percent of the time when followed correctly.
- Zipwhip's infrastructure, which applies stricter safeguards to migrations than newly activated phone numbers, correctly blocked 100 percent of hijacking attempts on established numbers.
- No consumers were impacted, and no evidence exists that consumers have ever been impacted by this scenario.
- Zipwhip had no involvement with activating the hijacked numbers, other than providing the infrastructure.
- Zipwhip quickly identified the procedural gap that allowed this to happen and is taking appropriate action.

ⁱⁱ See ex parte filing of Somos, Inc., Attachment – Texting with Toll-Free Numbers White Paper, WT 08-7 (Sept 29, 2016) ("Somos White Paper")



Empowering Toll Free Subscribers

Zipwhip's Contribution to Texting on Toll Free
RespOrgs and Risk of Abuse
Toll Free Subscriber Rights

Zipwhip's Contribution to Texting on Toll Free

Zipwhip started with a simple idea: consumers and businesses should be free to choose how they communicate without limits imposed by old landline and toll free technology. In its 50-year history, innovation in the toll free industry meant the introduction of new 8XX number ranges.²⁶ By introducing A2P business texting on toll free, Zipwhip extended the life and relevance of the toll free industry and benefitted all participants, including consumers, businesses, toll free subscribers, RespOrgs, and even Somos.

Each wireless operator has different requirements and supports different technical protocols for exchanging A2P text traffic, but Zipwhip built an easy, uniform front-end interface. Like many other well-ordered mobile products and services, Zipwhip's A2P texting infrastructure provides cross-carrier connectivity to any company that wants it, however they want it. Small businesses purchase software, enterprises purchase API, and larger aggregators purchase SMPP.

The TSS Registry didn't yet exist when Zipwhip launched A2P texting on toll free, but text messaging is an information service that is added only to active phone numbers. As such, selecting a texting service provider does not require the allocation or assignment of new numbering resources. The role played by the SMS/800 Registry was sufficient to

²⁶ See: "History of Toll Free" Somos Website, available at: <https://www.somos.com/about-us>

meet the industry's needs for organizing unique numbering assets.

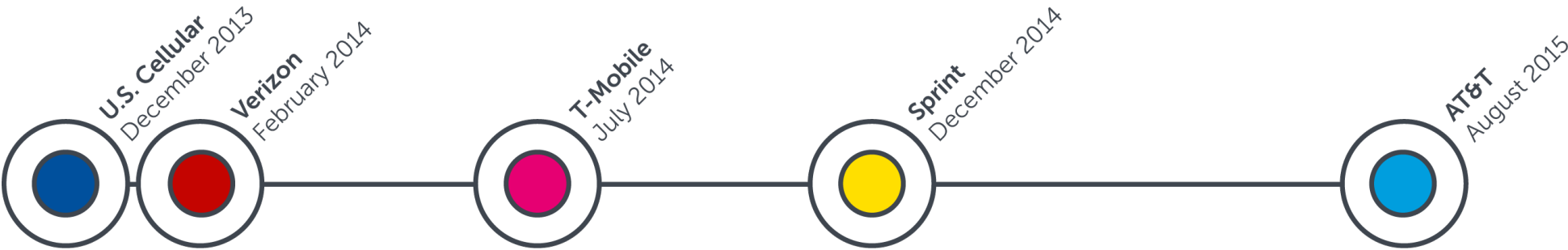
Then in July 2015, Somos announced the new Texting and Smart Services Registry ("TSS Registry"), which supported not only texting on toll free but also a vague claim to route all "future multimedia services".²⁷ Wielding its tariff for toll free call routing as a weapon, Somos is attempting to extend the role mandated for it in voice services to an unregulated market for information services.

Although Somos is meant to act as an impartial administrator of numbering assets on behalf of the entire toll free industry, it has never recognized the significant investment that Zipwhip has made to the industry or Zipwhip's role in providing valuable and wanted functionality to toll free subscribers that was not available before.

Today, the industry faces a choice between two different philosophies for supporting texting on toll free.²⁸ The prevailing model, which Zipwhip and CTIA both support, gives toll free subscribers control over their own toll free phone numbers.²⁹ It follows industry standard best practices for balancing risk mitigation with user adoption as appropriate for the young and evolving market. It is working well and has seen strong growth and adoption by major brands³⁰.

An alternative model, which Somos and its RespOrgs would like to see implemented, would force each toll free subscriber to request permission from a third-party RespOrg before activating texting on its own toll free number.³¹ This would add unneeded delay to the activation time, layer additional fees, hurt adoption, and give the RespOrg leverage to undermine subscriber choice of texting providers.

LAUNCH TIMELINE: A2P TEXTING ON TOLL FREE



²⁷ See: "SMS/800 Announces Launch of Texting & Smart Services Registry." Press Release. (Aug 19, 2015).

²⁸ See: CTIA Presentation
²⁹ See: Ibid.
³⁰ See: Zipwhip Letter
³¹ See: Somos Petition

RespOrgs and Risk of Abuse

AT&T began providing toll free services in 1967, but technical limitations at the time tied each toll free phone number to a specific network. In 1993 the FCC mandated the development of a centralized database system for number portability, giving rise to the modern RespOrg.³² Thus, the whole reason that RespOrgs exist is to uphold the toll free subscriber's rights and remove the voice service provider's ability to limit the subscriber's number usage.

Time and again, RespOrgs have abused this position. The FCC prohibits the brokering of toll free phone numbers, but a report prepared for the North American Numbering Council describes "strong forces at work driving an underground market in toll free numbers"³³ and the FCC has in the past pursued action against RespOrgs.³⁴ While it is extremely difficult to determine whether RespOrgs are engaged in warehousing or brokering numbers, the report highlights the "clear" fact that desirable numbers are rarely, if ever, returned to the spare pool.³⁵

When it comes to texting on toll free, there is no technical reason that RespOrgs need to intermediate

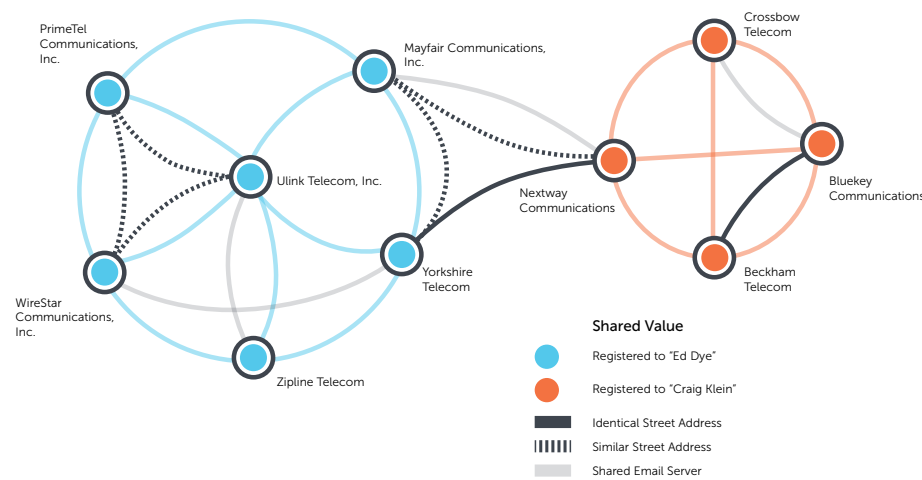
texting services, which are routed in a fundamentally different manner from voice calls.³⁶ Although Somos states that anti-competitive blocking practices should be prohibited under a RespOrg-controlled regime,³⁷ that suggestion is undermined by the proposed policy that applications be rejected by default when a RespOrg fails to review them.³⁸ Many RespOrgs are also texting providers,³⁹ and they have no incentive to facilitate activation of texting services for competitors. In this case, RespOrg control would artificially limit the functionality and portability of the toll free number. Even absent explicitly anti-competitive practices, RespOrgs would be free to make a sales effort to undercut their competition. This undermines the RespOrg's primary purpose in giving the subscriber control.

Although many RespOrgs are large reputable companies like AT&T and Verizon, many others are less well known. In fact, many of the 300+ Resporgs registered with Somos appear to be comprised of shell companies. A well known example in the toll free industry, PrimeTel Communications had "snatched up" nearly 25 percent of all available 1-800 numbers by 2011, which they used almost exclusively to host phone sex lines targeting wrong number

dials.⁴⁰ Today, that share is almost certainly larger. As you can see in this exhibit, ten separate companies ostensibly operate as different RespOrgs, but many of these "separate" companies share identical contact names, mailing addresses, and email domains, suggesting that they are, in fact, all affiliated with PrimeTel Communications.

Zipwhip is accountable to the wireless operators, with strict contractual SLA requirements for the safety and security of its text-enabling processes. A fast, efficient validation process that is accountable to the wireless operators is preferable to a slow, opaque process administered by companies like PrimeTel Communications and its affiliates.

10 RESPORGS WITH SHARED ATTRIBUTES



32 See: Toll Free Service Access Codes; Database Services Management, Inc. Petition for Declaratory Ruling; Beehive Telephone Company Petition for Declaratory Ruling, CC Docket No. 95-155, NSD File Nos. L-99-87, L-99-88, Fifth Report and Order, 15 FCC Rcd 11939, 11941, para. 3 (2000) (Toll Free Fifth Report and Order); Comptel Declaratory Ruling 8 FCC Rcd at 1423

33 See: "Toll Free Resources Allocation, Assignment and Management" White Paper. North American Numbering Council Future of Numbering Working Group. (May 14, 2010) ("FON White Paper") at 12

34 See: Richard Jackowitz and IT Connect, Inc. "Notice of Apparent Liability for Forfeiture." FCC-14-25A1 (Mar 25, 2014)

35 See: FON White Paper at 12

36 See: Somos Petition at 5

37 See: Somos Petition at 15

38 See: Somos Petition at 10

39 RespOrgs that also provide texting services include 5 companies on Somos' Board of Directors or Advisory Board: ATL Communications, AT&T, Twilio, TSG Global, and Bandwidth

40 See: Associated Press. "Porn Company Has Snatched Up Nearly 25% of 1-800 Numbers in U.S., Canada." Fox News Website. (Apr 19, 2011)

Toll Free Subscriber Rights

A fundamental principle of the toll free industry is the subscriber’s right to control its own toll free numbers.⁴¹ This is important because businesses invest tremendous resources to maintain and promote these phone numbers in marketing campaigns.⁴²

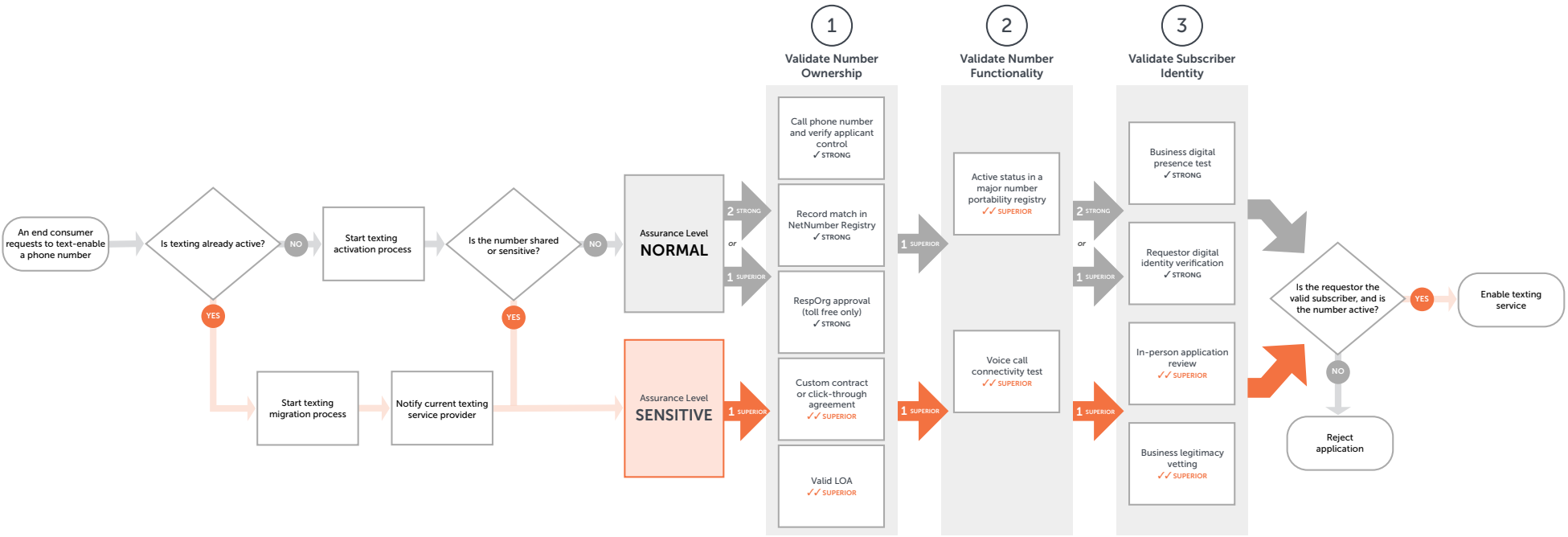
The old RespOrg model is designed to support the subscriber in the “provision of telecommunications services”⁴³ and assist with number portability. Now modern technology supports information services on toll free phone numbers, and it follows that businesses should be free to choose among services and service providers without limitations imposed by the initial voice service provider. So long as the toll free subscriber’s identity and ownership is validated, there is no need to give a RespOrg bottleneck control over texting functionality.⁴⁴ In fact, the ease of activating texting on toll free without waiting on hold with customer service or revisiting voice contracts is a major selling point that has contributed to this new technology’s adoption among major brands.⁴⁵

The current authentication model is robust enough to protect consumers and flexible enough to empower toll free subscribers. Service providers are free to validate number ownership, functionality,

and subscriber identity by consulting a registry. The TSS Registry operated by Somos is one option. The NetNumber Global Data Services (GDS) Registry is another.⁴⁶ Or, toll free subscribers may submit an LOA following the same industry standard validation process required to port a toll free number between two RespOrgs.⁴⁷ Sensitive numbers, like official government toll free numbers, and shared numbers are more rigorously vetted. And, migrations must have the approval of the existing text service provider.

If an entirely new registry is required to add an information service like texting to an existing and thus already-registered number, where does it end? Rich Communication Services (RCS) are now interoperable with SMS and MMS,⁴⁸ which means video chat and file transfer can be addressed to toll free numbers today. Is a separate registry required for video chat, file transfer, or mobile payments? How would that reward innovation or keep pace with market changes? Such a broad restriction risks limiting a subscriber’s rights.

AUTHENTICATION PROCESS TO TEXT ENABLE



41 Ssee: CTIA. "SMS Interoperability Guidelines." Version 3.2.2., Best Practices Document, January 2015.
42 See: Somos White Paper at 2-3
43 47 C.F.R. § 52.1(b).
44 See: Zipwhip Letter
45 Ibid.

46 See: "Global Data Services" NetNumber website at <http://netnumber.com/products/gds/>
47 See: "FON White Paper" at 14

48 See: Sprint. "Sprint is the First Carrier to Launch RCS Messaging with Google." Press Release. (November 4, 2016).



Conclusion

No Intervention is Needed

No Intervention is Needed

The entire premise of the toll free industry is based on the concept of a long distance toll, an arcane concept from a previous era. The residual value of toll free numbers comes from businesses' investment in those numbers over many years. The A2P texting on toll free infrastructure developed and made possible by Zipwhip has given the toll free industry a new lease on life, extending the functionality of toll free phone numbers into the new mobile era.

Texting on toll free offers an important channel for businesses and consumers to connect in convenient, consented, asynchronous text conversations. It's new, fresh and still evolving. Neither businesses nor consumers would be served by forcing texting on toll free into a template that was designed in a previous era for a different product. In fact, the core goal of the original toll free registry—number portability—is best served by giving businesses control and choice over their numbers.

Somos' recommendations would hurt this nascent texting on toll free industry, abbreviate businesses' control over their own toll free phone numbers, and limit consumers' choices of service providers. The concerns they raise have impacted no consumers, do not present an urgent risk, and can be adequately addressed by market forces already in play, including

the new guidelines that CTIA and its Messaging Working Group are currently drafting.

There do exist threats to texting on toll free, but Zipwhip is not a threat. Zipwhip is the company that negotiated aggressive SLAs with the wireless operators to put A2P texting infrastructure in place, went to war against phishing scams, and has pushed for constant innovation. Now texting on toll free has a bright future, and it's working. Just look at the caliber of brands that have signed on.

The marriage between texting and toll free brings together two well-established industries. Any collision between industries, technologies, and business models is bound to create friction, and texting on toll free is no exception. However, the terms of this conflict are being blown out of proportion. Texting on toll free is thriving, and it will continue to grow and evolve as the industry matures. It should not be hindered by burdensome regulations that may ultimately harm the business and consumer public interest in this space.

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About Zipwhip

Zipwhip, a Seattle-based business texting software provider, pioneered the concept of using the cloud to enable existing landline, VoIP, and toll free numbers to send and receive text messages from any connected device.

Additionally, Zipwhip offers a carrier-grade cloud texting platform to help mobile and landline operators modernize the texting medium. Its technology introduces trailblazing functionality while holding true to the distinct culture of texting that consumers have grown to love.



FOR MORE INFORMATION

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